WESTBANK ASBESTOS REMOVAL ACTION
Proposed Action Plan Parameters

REMOVAL ACTION'S GOAL (per current Action Memo): "Abate the (*potential*) health threats posed by the ACM in the Westbank's residential properties and public public access areas" by removing a "suffiicient volume of ACM from each property (*implied residential properties*) to significantly reduce the likihood of future releases (*and potential exposure*). The visible ACM in the publicly accessible areas will be excavated to a depth of *two* feet."

Two other goals desired to be attained but not absolute with a time-critical removal action (which addresses the immediate threat) are:

(1) Address the ACM such as to significantly reduce the liklihood of potential asbestos-fibers exposure as concurred upon by ATSDR.

(2) Remove the ACM to a depth so as to reduce the future possibility of ranking the site for the NPL (long term threat and vague/costly guidance thus far).

Type of Area	Maxium depth of ACM excavated*	ACTION LEVEL*	Geo-line	Backfill material
YARD	12"	< 1 %	yes	sod/sand OR rock/sand
DRIVEWAY & concrete walkways, patios	6"	n/a (encapsulation)	yes	concrete OR rock/sand
TRANSITION	12"	all visible ACM OR TBD by OSC**	yes	rock/sand, concrete, OR sod/sand
SERVITUDE	12"	all visible ACM**	yes	rock/sand OR sod/sand

BACKFILL MATERIAL: like-material removed, like-material replaced.

*Apply whichever is first: Maxium depth or Action Level.

**typlically, areas that are visibly clean and have been "polished" are also <1% (sometimes it may < 5%). To Be Determined is based upon a visible inspection and the projected future utilization of a particular area as many times it may be impracticable to

remove 12".

TRANSITION AREAS: the small surface areas between the driveway and the extent of ACM beyond the driveway area. These are the areas surrounding and different from the driveway areas and serves as a transition area to the home, building, fence line, or other yard areas. They are considered restricted access areas. Projected future utilization will be evaluated on a case-by-case bases to ensure a specific location shouldn't be classified as a Yard Area. The Transition Area will be excavated until all the visible ACM is removed and the area "polished".

SERVITUDE: is the area in front of the residential properties and extends from the edge of the street typically to a fence-line or lawn area. The servitudes are considered the right-of-way for public utlities and many times has a storm-sewer drainage pipe in it. The excavation goes to the top the pipe and extends at a 45° angle away from the pipe and street.

POLISHING: is the excavations crew's method of excavating/scraping another 1-2 inches of soil after the bulk ACM is removed and the hole appears "visibly" clean of asbestos. Since it's implementation, polishing a hole has proven effective in reducing the confirmation samples to below 5% PLM (usually below 1%). *On the few instances that a timely restoration needs to occur prior to receiving the confirmation sample results, a judgement call (perhaps with ATSDR recommendation) will be made to restore based upon a thorough visual inspection of that particular location.*

It is cost effective to remove only visible ACM (even a few inches) due to volume savings (disposal & restoration) even though the excavation contractor is paid the first six inches (unit price area) and by volume thereafter.

We have implemented that the START team to more closely pre-marked the site and to develope a detailed diagram of the site (dimensions, depth of ACM, depth of surface cover, site specific info, etc.). The diagram is marked accordingly to the type of areas discussed above, recommendations on amount to remove and restoration material for the OSC's approval before giving to USACE for removal. This has proved to clarify particulars about a specific locations and has "eased" the apparent confusion for each site. Problems areas are identified and addressed eariler in the site's process of excavation and restoration. EX: a major problem is what should be considered sufficient cover which could be resolved with ATSDR's concurrence/recommendation. Deviations will certainly occur from the diagram's recommendations but they should (and have) become fewer as the process become more consistent. If possible, the diagram will be used to show the property's owner restoration approval before excavation begins.

Every site will be INSTITIONALIZED by notifying the property owner, parish/city officials, DEQ/LDHH, and perhaps the local utilities/DOTTY. Information provided will include a diagram of the property with areas addressed, analytical results of each grid sampled or the summary of the visual inspection, and procedures on what to do if ACM is ever encountered in

the future.

Reducing the volume excavated is the key to reducing the project's overall cost. Previously we were excavating a large volume of "clean" material. Also, many sites are clearly not candidates for concrete "cover" and are not driveway areas. A driveway or sidewalk/patio area that qualifies for concrete are those which presently have fair-shape ACM which comprises of more than 50% of that area otherwise we offer rock or soil. The vast majority of the residents understand what consitutes a fair restoration. This compriable restoration should also maintain each site's sensative surface drainage, i.e. rock drains better than a concrete mass. (FOI: Most residents want rock/sand (or concrete) instead of sod/sand because they do not want to mow the grass.)